

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

IVETTE M. MARTÍNEZ GONZÁLEZ, ET AL.,

Plaintiffs,

v.

CATHOLIC SCHOOLS OF THE
ARCHDIOCESES OF SAN JUAN PENSION
PLAN, ET AL,

Defendants.

CIVIL No. 16-2077 (GAG-BJM)

NORMA I. CARDOZA ESTREMER, ET AL.,

Plaintiffs,

v.

COLEGIO PADRE BERRÍOS, ET AL.,

Defendants.

CIVIL No. 16-2318 (GAG-BJM)

**MOTION REQUESTING UNTIL JANUARY 3RD TO COMPLY WITH
DISCOVERY REQUESTS AND/OR OPPOSE MOTION TO COMPEL
(DOCKET NO. 157)**

TO THE HONORABLE COURT:

COMES NOW co-defendants in Civil No. 16-2077, Juan Santa (“Mr. Santa”) and Rosa Figueroa (“Mrs. Figueroa”, together with Mr. Santa “co-defendants”), through the undersigned counsel, and very respectfully state and pray as follows:

1. On December 6, 2017, plaintiffs filed *Motion to Renew Motion to Compel Discovery and Request for Extension of Time to File Response in Opposition to Motion to Dismiss* (the “Renewed Motion to Compel”). See **Docket No. 157**.
2. Through the *Renewed Motion to Compel*, plaintiffs raise various objections as to the written discovery responses submitted by defendants in this case.

To that end, plaintiffs are requesting an order from this Honorable Court compelling defendants to respond to specific written discovery arguing, among other things, that this alleged conduct has “hampered” their ability to complete discovery and take several depositions. *See Docket No. 157* at page 19.

3. More specifically, in the *Renewed Motion to Compel*, plaintiffs allege that appearing co-defendants failed to produce or legally object various requests for production of documents. The motion also raises other discovery challenges that warrant a response from co-defendants, including among others, plaintiffs’ failure to comply with Local Rule 26(b) requirements regarding to the reasonable efforts to reach agreements with the opposing party on the matters set forth in the motion.

4. In light of the above, co-defendants request until **January 3, 2018** to respond to the *Renewed Motion to Compel*.

5. For the reasons stated above, Co-defendants respectfully submit that there is good cause for an extension of the 14-day deadline pursuant to Local Rule 7(b) to respond to the *Renewed Motion to Compel*. This request is not intended to cause undue delay of the proceedings in this case and will not serve in prejudice of any of the parties since this Honorable Court has already granted an extension until the requested date, January 3, 2018 to co-defendant The Superintendence of Catholic Schools of the Archdioceses of San Juan to respond to the *Renewed Motion to Compel*.

WHEREFORE, appearing co-defendants respectfully requests this Honorable Court to allow the instant motion and, consequently, to grant them until January 3, 2018, to respond to the *Renewed Motion to Compel*.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 20th of December of 2017.

IT IS HEREBY CERTIFIED that on this same date a true and exact copy of the foregoing motion was filed electronically with the Clerk of Court via the CM/ECF system, which will send notification of such filing to all attorneys of record.

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